



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

April 15, 2015

By Email & ECF

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Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

The government previously disclosed records custodian certifications in connection with discovery in this matter. The government writes to provide written notice that it intends to offer certain business records via certifications pursuant to Federal Rule of Evidence 902(11). Enclosed please find copies of the certifications previously disclosed and additional certifications that the government has obtained. The original records and certifications are available for inspection. The following table sets forth the records that correspond to each certification:

<u>CERTIFICATION</u>	<u>RECORDS</u>
Alliance Bank of Arizona (May 21, 2012 and May 24, 2012)	BNK-AB 1-2493
JP Morgan Chase (Feb. 17, 2012, Feb. 24, 2012, Mar. 7, 2012, and Aug. 6, 2013)	BNK-CHASE 1-2642
Citibank (Mar. 10, 2012)	BNK-CITI 5-29
Citibank (Apr. 30, 2012)	BNK-CITI 34-49
Citibank (Aug. 4, 2012)	BNK-CITI 309-601

Bank of America (May 21, 2009)	BNK-BOA 1-53
Bank of America (Mar. 19, 2012)	BNK-BOA 55-743
Bank of America (Feb. 7, 2012)	BNK-BOA 745-2299
Bank of America (Mar. 18, 2013)	BNK-BOA 2301-2340
Bank of America (Feb. 19, 2013)	BNK-BOA 2343-2350
Bank of America (May 7, 2012)	BNK-BOA 2351-3731
Bank of America (Apr. 27, 2012)	BNK-BOA 3733-3832
Bank of America (July 30, 2012)	BNK-BOA 4761-5370
First American Title (July 23, 2012)	FA-TITLE 6-2397
First American Title (Oct. 17, 2013)	FA-TITLE 2397-2488
Wells Fargo (Oct. 23, 2013)	BNK-WF 10-306
Wells Fargo Home Mortgage (Mar. 23, 2010)	BNK-WF 2437-2833
Wells Fargo (Apr. 18, 2012)	BNK-WF 2116-2436
City National Bank (Mar. 14, 2012)	BNK-CNB 2-74
Citizens Bank (Mar. 27, 2015)	CTZN 1-5
Fall-Line Motorsports (Apr. 15, 2015)	FL 1-13
FINRA (Apr. 10, 2015)	FINRA 8-23
Michael Shank Racing (Apr. 13, 2015)	MS 1
Kinetic Speed Shop (Apr. 13, 2015)	KSS 1-4
Racers Edge Motorsports (Apr. 14, 2015)	REM 1-11
Fidelity - Security Title Agency (Mar. 12, 2012)	BNK-FID 3-78
Fireman's Fund Insurance Company (Apr. 2, 2012)	FFIC 1-613
TD Bank (Apr. 2, 2010 and Apr. 5, 2010)	BNK-TD 1410-1696
Federal Reserve Bank (Mar. 27, 2015)	BNK-FR 1 excerpts (included)

The government also notes that it has obtained certified copies of the corporate filings for Constantine Management Group from the Secretary of State of Illinois and certified copies of the corporate filings for the following companies from the State of Delaware: LedBetter Development Company, LLC; Little Isle IV, LLC; Big Isle IV Ventures, LLC; Big Isle V Ventures, LLC; Big Isle VI Ventures, LLC; Kau Holding Company, LLC; Kau Holding, LLC; Ula Makika, LLC; Eufora LLC; Eufora Capital II, LLC; Eufora Capital III LLC; AZ Eufora Partners I, LLC; AZ Eufora Partners II, LLC; AZ Eufora Partners III, LLC; AZ Eufora Partners IV, LLC; AZ Avalon Partners LLC; AZ Falcon Partners LLC; Eclipse 500 Partners, LLC; Set Jet, LLC; Set Jet Holdings, LLC; Avalon Investment LLC; Avalon Investments, LLC; and Avalon Investments IV, LLC. The government intends to offer these documents as self-authenticating under Federal Rules of Evidence 902(1), 902(2) and/or 902(4); the documents are available for inspection.

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)